

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Samuel Delacruz		CHAPTER 7
	Debtor(s)	
Bank of America, N.A.		
	Movant	
vs.		NO. 23-11283 PMM
Samuel Delacruz		
	Debtor(s)	
Bonnie B. Finkel Esq.		11 U.S.C. Section 362
	Trustee	

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Bank of America, N.A. has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **August 03, 2023**, you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
United States Bankruptcy Court
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:
Bankruptcy Group
KML Law Group, P.C.
Suite 5000 – BNY Independence Center
701 Market Street
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer Judge, the United States Bankruptcy Judge, in Courtroom 4th Floor at the United States Bankruptcy Court, 201 Penn Street, Suite 103, Reading, PA 19601 on **August 15, 2023, at 10:00 AM.**, or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Michael P. Farrington

Michael P. Farrington, Esquire

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106-1532

Phone: (215) 627-1322 Fax: (215) 627-7734

Attorneys for Movant/Applicant

July 20, 2023